

**ExxonMobil Chemical Company**

Baton Rouge Resin Finishing Plant

12480 Scenic Highway

Baton Rouge, LA 70807-1327



February 22, 2019

**ExxonMobil Baton Rouge Resin Finishing Plant, AI 3230  
ExxonMobil Chemical Company Flare Consent Decree Semi-Annual Report**

Director, Air Enforcement Division  
Office of Civil Enforcement  
U.S. Environmental Protection Agency  
Mail Code 2242-A  
1200 Pennsylvania Ave, N.W.  
William Jefferson Clinton Building  
Room 1119  
Washington, DC 20460-0001

**Attention: Consent Decree, Civil Action No. 4:17-cv-3302**

Pursuant to Section X, Paragraphs 66-73 of Consent Decree, Civil Action No. 4:17-cv-3302, Exxon Mobil Corporation submits this Semi-Annual Report (SAR) covering the period of June 6, 2018 through December 31, 2018.

Certification Statement  
Per Consent Decree Paragraph 71:

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

If you have any questions about this SAR or require any additional information, please contact Jacob Talbot at 225-977-6464.

Sincerely,

A handwritten signature in blue ink, appearing to read "Angela Zeringue".

Angela Zeringue  
Plant Manager

cc:

EES Case Management Unit  
Environment and Natural Resources Division  
U.S. Department of Justice  
P.O. Box 7611  
Washington D.C. 20044-7611  
**Re: DJ # 90-5-2-1-10128 AND 10128/1**  
**CERTIFIED**

United States Attorney  
Southern District of Texas  
Andrew A. Bobb  
Assistant U.S. Attorney  
1000 Louisiana St., Suite 2300  
Houston, TX 77002  
**CERTIFIED**

Associate Director  
Air, Toxics, and Inspections Coordination  
Branch (6 EN-A)  
U.S. EPA, Region 6  
1445 Ross Avenue  
Dallas, Texas 75202  
**CERTIFIED**

Celena J. Cage  
Administrator, Enforcement Division  
Office of Environmental Compliance  
Louisiana Department of Environmental Quality  
P.O. Box 4312  
Baton Rouge, Louisiana 70821-4312  
**CERTIFIED**

Electronic Copies:

Robert Parrish, EPA (email only; [parrish.robert@epa.gov](mailto:parrish.robert@epa.gov))  
Patrick Foley, EPA (email only; [foley.patrick@epa.gov](mailto:foley.patrick@epa.gov))  
Margaret Osbourne, EPA Region 6 (email only; [osbourne.margaret@epa.gov](mailto:osbourne.margaret@epa.gov))  
EES Case Management Unit, ([eescdcopy.enrd@usdoj.gov](mailto:eescdcopy.enrd@usdoj.gov))



**Baton Rouge Resins Finishing Plant**

**Baton Rouge, Louisiana**

**SEMI-ANNUAL REPORT  
PURSUANT TO CONSENT DECREE,  
*UNITED STATES, ET AL V. EXXON MOBIL CORPORATION  
AND EXXONMOBIL OIL CORPORATION,*  
CIVIL ACTION NO. 4:17-cv-3302 (S.D. TX)**

**June 6, 2018 – December 31, 2018**

12840 Scenic Highway  
Baton Rouge, LA

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## SECTION 1 STATUS OF CONSENT DECREE SECTION V COMPLIANCE REQUIREMENTS

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This progress report provides the status of implementation of Consent Decree requirements that, during the reporting period, require the ExxonMobil Baton Rouge Resins Finishing Plant to undertake a specific action or make a submittal to an agency; or otherwise require the ExxonMobil Baton Rouge Resins Finishing Plant to take specific steps to implement new obligations, including new control or emissions requirements, new monitoring requirements, or institution of new procedures. Once the ExxonMobil Baton Rouge Resins Finishing Plant has reported a requirement as implemented, it will not appear in subsequent progress reports under this subparagraph.

Consent Decree Paragraph 66a. – b.

a. A description of the status of work performed and progress made toward implementing all requirements of Consent Decree Section V (Compliance Requirements) at the Covered Facilities. This topic should describe any major milestones completed and remaining to be completed;

**Status: ExxonMobil Baton Rouge Resins Finishing Plant has completed the following work required to meet the requirements of Consent Decree Section V Compliance Requirements. Major milestones completed for this reporting period are in Table 1.1.**

**TABLE 1.1 Major Milestones Completed For This Reporting Period**

Covered Flare	Description of Work Completed During This Reporting Period
None	None

**Status: ExxonMobil Baton Rouge Resins Finishing Plant is in the process of completing the following work as required to meet the requirements of Consent Decree Section V Compliance Requirements.**

**TABLE 1.2 Status of Remaining Work to be Completed**

Applicability	Remaining Work To Be Completed	Anticipated Completion Date
Finishing Flare	Submit Flare Data and Monitoring Systems and Protocol Report	No later than 6/6/2019
Finishing Flare	Submit Initial Waste Gas Minimization Plan	No later than 6/6/2019

Finishing Flare	Conduct internal reporting and recordkeeping for Reportable Flaring Incidents	No later than 6/6/2019
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b. A description of any problems encountered or anticipated in meeting the requirements in Consent Decree Section V (Compliance Requirements) at the Covered Facilities, together with implemented or proposed solutions;

**Status: ExxonMobil Baton Rouge Resins Finishing Plant has not encountered problems nor anticipates problems in meeting the requirements of Consent Decree Section V Compliance Requirements as shown in Table 1.3.**

**TABLE 1.3 Encountered or Anticipated Problems In Work To be Completed**

Covered Flare	Encountered or Anticipated Problem(s)	Proposed or Implemented Solution(s)
None	None	None

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## SECTION 2 STATUS OF CONSENT DECREE SECTION V REPORTING REQUIREMENTS

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Below is a summary of the status of reports as required under Consent Decree Section V.

### Flare Data and Monitoring Systems and Protocol Report

Requirement: CD Paragraph 18

Description: For each Covered Flare, by no later than 365 Days after the Effective Date, the Defendants must submit a report, consistent with the requirements in Appendix 1.5, to EPA that includes the following:

- a. The information, diagrams, and drawings specified in Paragraphs 1–7 of Appendix 1.5;
- b. A detailed description of each instrument and piece of monitoring equipment, including the specific model and manufacturer, that the Defendants have installed or will install in compliance with Paragraphs 20–24 of this Consent Decree (Paragraphs 8–9 of Appendix 1.5); and
- c. A narrative description of the monitoring methods and calculations that the Defendants will use to comply with the requirements of Paragraph 43 (Paragraph 10 of Appendix 1.5).

**Status: This section does not apply to this reporting period. The Flare Data and Monitoring Systems and Protocol Report is due no later than June 6, 2019.**

### Initial Waste Gas Minimization Plan (“Initial WGMP”)

Requirement: CD Paragraph 29

Description: By no later than 365 Days after the Effective Date, for each Covered Flare, the Defendants must submit to EPA an Initial Waste Gas Minimization Plan that discusses and evaluates flaring Prevention Measures on both a facility-wide and Covered Flare-specific basis for each Covered Facility.

**Status: This section does not apply to this reporting period. The Initial Waste Gas Minimization Plan submittal is due no later than June 6, 2019.**

### First Updated Waste Gas Minimization Plan (“First Updated WGMP”)

Requirement: CD Paragraph 29

Description: By no later than 730 Days after the Effective Date, the Defendants must submit to EPA a First Updated WGMP that updates, if and as necessary, the information, diagrams, and drawings required in the Flare Data and Monitoring Systems and Protocol Report required by Paragraph 18 and the information required in sub-Paragraphs 29.a–29.e for the 12-month period after the period covered by the Initial Waste Gas Minimization Plan.

**Status: This section does not apply to this reporting period. The first Updated Waste Gas Minimization Plan submittal is due June 5, 2020.**

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## SECTION 3 STATUS OF PERMITTING ACTIVITY

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Consent Decree Paragraph 66c.

- c. A description of the status of any permit applications, including a summary of all permitting activity, pertaining to compliance with this Consent Decree;

**Prior to permit submittals, ExxonMobil Chemicals Baton Rouge Area Operations met with the Louisiana Department of Environmental Quality (LDEQ) to discuss how applicable requirements would be incorporated into the existing permit. ExxonMobil Baton Rouge Resins Finishing Plant is preparing to submit a permit application to LDEQ, Permit 0840-00035-13. The application will request to incorporate the requirements listed in the Consent Decree sub-Paragraph 60.c into Permit 0840-00035-14 such that the requirements will (i) become and remain “applicable requirements” and (ii) survive the termination of the Consent Decree. In accordance with Consent Decree Paragraph 60.b., the permit applications will be submitted no later than one year after the Effective Date or one year after the respective deadline for the Compliance Requirements listed in Paragraph 60.a.**

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## SECTION 4 REPORTS SUBMITTED TO LDEQ

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Consent Decree Paragraph 66d.

- d. A copy of any reports that were submitted only to LDEQ and that pertain to compliance with this Consent Decree.

**Status: ExxonMobil Baton Rouge Resins Finishing Plant is providing reports that may pertain to compliance with this Consent Decree and that were submitted only to LDEQ in Attachment A.**

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## SECTION 5 STATUS OF SEP(S)

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Consent Decree Paragraph 66e.

e. A description of the Defendants' progress in satisfying its obligations in connection with the SEP(s) under Section VI including, at a minimum, a narrative description of activities undertaken; status of any construction or compliance measures, including the completion of any milestones set forth in the SEP Work Plan (attached as Appendix 2.1), and a summary of costs incurred since the previous report;

**Refer to Semi-Annual Report submitted by ExxonMobil Baytown Chemical Plant for status of Federal Supplemental Environmental Project (SEP).**

**Refer to Semi-Annual Report submitted by the ExxonMobil Baton Rouge Chemical Plant for status of Louisiana Beneficial Environmental Projects (BEPs).**

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## SECTION 6 UPDATED WASTE GAS MINIMIZATION PLAN (WGMP)

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Consent Decree Paragraph 66f

f. Any updated WGMP for the Covered Facilities that is required to be submitted by Paragraph 31.

Subsequent Updates to WGMPs (“Subsequently Updated WGMP”)

Requirement: CD Paragraph 31

On an annual basis after submitting the First Updated WGMP until termination of the Decree, the Defendants must submit an updated WGMP for a Covered Facility as part of the Semi-Annual Report required by Section IX (Reporting Requirements) if, at that Covered Facility, the Defendants: a) commence operation of a Newly Installed Covered Flare or permanently remove a Covered Flare from service, b) connect a new Waste Gas stream to a Covered Flare, c) intentionally modify the Baseload Waste Gas Flow Rate to a Covered Flare, d) install additional FGRS, or e) change the design of a Covered Flare. Each update must update, if and as necessary, the information required in sub-Paragraphs 29.a.i - 29.a.iii. Each update must update, if and as necessary, the information required in sub-Paragraphs 30.a and 30.b. To the extent the Defendants propose to extend any schedule set forth in a previous WGMP for any of the Covered Facilities, the Defendants may do so only with good cause, the determination of which is subject to Section XII (Dispute Resolution).

**This section does not apply to this semi-annual reporting period. The Initial Waste Gas Minimization Plan is due no later than June 6, 2019 and the first Updated Waste Gas Minimization Plan is due no later than June 5, 2020.**

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## SECTION 7 SUMMARY OF INTERNAL FLARING INCIDENT REPORTS

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Consent Decree Paragraph 66g.

g. Any summary of internal flaring incident reports as required by Paragraph 34.

**Status: This section does not apply to this reporting period. In accordance with Paragraph 34.a. of the Consent Decree, ExxonMobil Baton Rouge Resins Finishing Plant will begin internal Reportable Flaring Incident (RFI) reporting and recordkeeping no later than June 6, 2019.**

## SECTION 8 REPORTING SUMMARY

Consent Decree Paragraph 66h.

- h. A summary of the following, per Covered Flare per Calendar Quarter (hours shall be rounded to the nearest tenth):
- (1) The total number of hours of Instrument Downtime claimed pursuant to Paragraph 45, expressed as both an absolute number and a percentage of time the Covered Flare that the instrument/equipment monitors is In Operation and Capable of Receiving Sweep, Supplemental, and/or Waste Gas;

**TABLE 8.1 June 6 – June 30, 2018 Instrument Downtime Summary**

Covered Flare	Monitoring System	System Downtime (%)	System Downtime (hours)
Finishing Flare	Vent Gas Flow	0.0	0.0
Finishing Flare	Air Flow	0.0	0.0
Finishing Flare	Camera	2.7	16.0

**TABLE 8.2 3<sup>rd</sup> Quarter 2018 Instrument Downtime Summary**

Covered Flare	Monitoring System	System Downtime (%)	System Downtime (hours)
Finishing Flare	Vent Gas Flow	0.1	1.8
Finishing Flare	Air Flow	0.0	0.3
Finishing Flare	Camera	1.6	36

**TABLE 8.3 4<sup>th</sup> Quarter 2018 Instrument Downtime Summary**

Covered Flare	Monitoring System	System Downtime (%)	System Downtime (hours)
Finishing Flare	Vent Gas Flow	0.1	2.0
Finishing Flare	Air Flow	0.1	1.5
Finishing Flare	Camera	0.0	0.0

- (2) If the total number of hours of Instrument Downtime claimed pursuant to Paragraph 45 exceeds 5% of the time in a Calendar Quarter the Covered Flare affected by the downtime is In Operation, an identification of the periods of downtime by date, time, cause (including Malfunction or maintenance), and, if the cause is asserted to be a Malfunction, the corrective action taken;

**Status: No Covered Flare incurred Instrument Downtime claimed pursuant to Paragraph 45 that exceeded 5% of the time the flare was In Operation in any Calendar Quarter, as noted by “None” in Tables 8.4 – 8.6.**

**TABLE 8.4 June 6 – June 30, 2018 Instrument Downtime Identification (if total hours exceeds 5%)**

Covered Flare	Monitoring System	Start Date/Time	End Date/Time	Cause	Corrective Action
None	None	None	None	None	None

**TABLE 8.5 3<sup>rd</sup> Quarter 2018 Instrument Downtime Identification (if total hours exceeds 5%)**

Covered Flare	Monitoring System	Start Date/Time	End Date/Time	Cause	Corrective Action
None	None	None	None	None	None

**TABLE 8.6 4<sup>th</sup> Quarter 2018 Instrument Downtime Identification (if total hours exceeds 5%)**

Covered Flare	Monitoring System	Start Date/Time	End Date/Time	Cause	Corrective Action
None	None	None	None	None	None

- (3) The total number of hours, expressed as both an absolute number of hours and a percentage of time that the Covered Flare was In Operation, in which the requirements of Paragraphs 43-44 were not applicable because the only gas or gases being vented were Pilot Gas or Purge Gas;

**TABLE 8.7 June 6 – June 30, 2018 Requirements of Paragraphs 43-44 Were Not Applicable Because Only Pilot or Purge Gas Flow**

Covered Flare	Time (%)	Time (Hours)
Finishing Flare	0.0	0.0

**TABLE 8.8 3<sup>rd</sup> Quarter 2018 Requirements of Paragraphs 43-44 Were Not Applicable Because Only Pilot or Purge Gas Flow**

Covered Flare	Time (%)	Time (Hours)
Finishing Flare	0.0	0.0

**TABLE 8.9 4<sup>th</sup> Quarter 2018 Requirements of Paragraphs 43-44 Were Not Applicable Because Only Pilot or Purge Gas Flow**

Covered Flare	Time (%)	Time (Hours)
Finishing Flare	0.0	0.0

(4) Exceedances of Combustion Efficiency Standards.

i. The total number of hours, expressed as both an absolute number of hours and a percentage of time the Covered Flare was In Operation, of exceedances of the emissions standards in Paragraphs 43-44; provided however, that if the exceedance of these standards was less than 5% of the time in a Calendar Quarter and was due to one or more of the exceptions set forth in Paragraph 45, the report shall so note; and

**Status:** No exceedance of combustion efficiency standards was due to one or more of the exceptions set forth in Paragraph 45, as noted by “None” in Tables 8.10 – 8.12.

**TABLE 8.10 June 6 – June 30, 2018 Exceedance of Standard less than 5% of the Time in this Period and Was Due to Exceptions Set Forth in Paragraph 45**

Covered Flare	Time (%)	Time (Hours)
None	None	None

**TABLE 8.11 3<sup>rd</sup> Quarter 2018 Exceedance of Standard less than 5% of the Time in this Period and Was Due to Exceptions Set Forth in Paragraph 45**

Covered Flare	Time (%)	Time (Hours)
None	None	None

**TABLE 8.12 4<sup>th</sup> Quarter 2018 Exceedance of Standard less than 5% of the Time in this Period and Was Due to Exceptions Set Forth in Paragraph 45**

Covered Flare	Time (%)	Time (Hours)
None	None	None

ii. If the exceedance of the emissions standards in Paragraphs 43-44 was not due to one of the exceptions in Paragraph 45 (Instrument Downtime), or if the exceedance was due to one or more of the exceptions in Paragraph 45 and the total number of hours caused by the exceptions exceeds 5% of the time in a Calendar Quarter that the Covered Flare affected by the Instrument Downtime was In Operation, an identification of each block period that exceeded the standard, by time and date; the cause of the exceedance (including startup, shutdown, maintenance, or Malfunction), and if the cause is asserted to be a Malfunction, an explanation and any corrective actions taken; and

**Status:** There were no exceedances of combustion efficiency standards as noted by “None” in Tables 8.13 - 8.15.

**TABLE 8.13 June 6 – June 30, 2018 Exceedance of Combustion Efficiency Standards**

Covered Flare	Combustion Efficiency Standard	Start Date/Time	End Date/Time	Cause	Corrective Action
None	None	None	None	None	None

**TABLE 8.14 3<sup>rd</sup> Quarter 2018 Exceedance of Combustion Efficiency Standards**

Covered Flare	Combustion Efficiency Standard	Start Date/Time	End Date/Time	Cause	Corrective Action
None	None	None	None	None	None

**TABLE 8.15 4<sup>th</sup> Quarter 2018 Exceedance of Combustion Efficiency Standards**

<b>Covered Flare</b>	<b>Combustion Efficiency Standard</b>	<b>Start Date/Time</b>	<b>End Date/Time</b>	<b>Cause</b>	<b>Corrective Action</b>
None	None	None	None	None	None

- (5) Compliance with Compressor Availability Requirements. Sufficient information to document compliance with the FGRS Compressor availability requirements of sub-Paragraph 38.b. For any period of non-compliance, the Defendants must identify the date, cause, and corrective action taken.

**This section does not apply to the ExxonMobil Baton Rouge Resins Finishing Plant.**

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## SECTION 9 ADDITIONAL MATTERS

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Consent Decree Paragraph 66i.

- i. Any additional matters that the Defendants believe should be brought to the attention of EPA, or LDEQ for the Baton Rouge Facilities.

**Covered Flare Finishing Flare is located at the ExxonMobil Baton Rouge Resins Finishing Plant. It is a Covered Flare permitted separately from any other Baton Rouge Covered Flares. ExxonMobil Baton Rouge Resins Finishing Plant is a minor source facility and thus does not have its own Title V Permit. ExxonMobil Baton Rouge Resins Finishing Plant will include federally enforceable limits into the existing minor source permit for ExxonMobil Baton Rouge Resins Finishing Plant for the requirements that will survive termination of this Consent Decree. A copy of the minor source permit application with the federally enforceable limits and issuance of the minor source permit by LDEQ, the delegated authority, will be remitted to EPA.**

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## SECTION 10 FENCELINE AIR MONITORING REPORTS

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Consent Decree Paragraph 67 a. – b.

The Defendants must submit Fenceline Air Monitoring Reports as part of each Semi-Annual Report. The Fenceline Air Monitoring Reports must contain the following information:

- a. In spreadsheet format, the individual sample results for each monitor comprising each Fenceline Monitoring System, each bi-weekly annual average benzene concentration difference value (once annual averages are available), and the corresponding meteorological data for the relevant monitoring periods. The first two columns of each spreadsheet shall be the date and time for each sample taken; and
- b. A detailed description of the actions and findings of any root cause analysis and corrective action(s) undertaken pursuant to Paragraph 3(g) of Appendix 2.2, including the known results of the corrective action(s) and the anticipated emissions reductions (in TPY per pollutant).

**This section does not apply to the ExxonMobil Baton Rouge Resins Finishing Plant.**

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## SECTION 11 ANNUAL EMISSION DATA

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Consent Decree Paragraph 68

In the Semi Annual Report that is submitted on February 28 of each year, the Defendants must provide, for each Covered Flare, for the prior calendar year, the amount of emissions of the following compounds (in tons per year): VOCs, HAPs, NO<sub>x</sub>, CO<sub>2</sub>, and methane.

As of the date of this Semi-Annual Report, the annual emissions are reflected in Table 11.1 below.

**TABLE 11.1 2018 Annual Emissions Data**

Covered Flare	Emissions, tons per year					
	VOCs	HAPs	NO <sub>x</sub>	CO <sub>2</sub>	Methane	Ethane
Finishing Flare	5	<1	1	2,927	<1	<1

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## SECTION 12 ANY ADDITIONAL NON-COMPLIANCE

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### Consent Decree Paragraph 69

Each Semi-Annual Report must also include a description of any non-compliance with the requirements of this Consent Decree not otherwise identified by Paragraph 66 along with an explanation of the violation's likely cause and of the remedial steps taken, or to be taken, to prevent or minimize such violation. If the cause of a violation cannot be fully explained at the time the report is due, the Defendants must so state in the report. In such a case, the Defendants must investigate the cause of the violation and then submit an amendment to the report, including a full explanation of the cause of the violation, within 30 Days of the Day the Defendants become aware of the cause of the violation. Nothing in this Paragraph or the following Paragraph relieves the Defendants of their obligation to provide the notice required by Section XI (Force Majeure).

**There were no non-compliance events in regards to any requirements of this Consent Decree which were not otherwise identified by Paragraph 66.**

**TABLE 12.1 Additional Non-Compliance**

<b>Covered Flare</b>	<b>Requirement Paragraph</b>	<b>Start Date/Time</b>	<b>End Date/Time</b>	<b>Cause</b>	<b>Corrective Action</b>
None	None	None	None	None	None

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**APPENDIX A REPORTS SUBMITTED TO LDEQ**

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*ExxonMobil*

Consent Decree Semi-Annual Report

*Baton Rouge Resins Finishing Plant*

June 6, 2018 – December 31, 2018

ExxonMobil Chemical Company  
Baton Rouge Resin Finishing Plant  
12480 Scenic Highway  
Baton Rouge, LA 70807-1327  
225 977 2540 Telephone  
225 977 2008 Facsimile

LABED RECEIPT

2019 JAN 16 PM 4:10

**ExxonMobil**  
Chemical

January 16, 2019

Office of Environmental Compliance  
Louisiana Dept of Environmental Quality  
P.O. Box 4312  
Baton Rouge, LA 70821-4312

Re: **NSPS K<sub>b</sub> Semiannual Report**  
Agency Interest No. 3230

Dear Sir or Madam:

As defined in Subpart K<sub>b</sub> - Standards of Performance for Volatile Organic Liquid Storage Vessels [§60.115<sub>b</sub>(d)(3)], the owner or operator of an affected facility is required to submit semiannual reports to the Administrator for all periods recorded in which the pilot flame was absent. The ExxonMobil Chemical Company, Baton Rouge Resin Finishing Plant (BRFP) is submitting this semiannual report, in accordance with the requirements specified in §60.115<sub>b</sub>(d)(3).

During the period from July 1, 2018 through December 31, 2018, BRFP experienced no flare pilot flame outages that resulted in venting from a storage vessel required to be controlled by 40 CFR 60, Subpart K<sub>b</sub>.

If you have any questions please feel free to contact me at (225) 977-6329.

Sincerely,

  
Marshall Berg  
Environmental Air Advisor

cc: LA-DEQ Capital Regional Office

ExxonMobil Chemical Company  
Baton Rouge Resin Finishing Plant  
12480 Scenic Highway  
Baton Rouge, LA 70807-1327  
225 977 2540 Telephone  
225 977 2008 Facsimile

**ExxonMobil**  
Chemical

July 9, 2018

Office of Environmental Compliance  
Louisiana Dept of Environmental Quality  
P.O. Box 4312  
Baton Rouge, LA 70821-4312

Re: **NSPS K<sub>b</sub> Semiannual Report**  
Agency Interest No. 3230

Dear Sir or Madam:

As defined in Subpart K<sub>b</sub> - Standards of Performance for Volatile Organic Liquid Storage Vessels [§60.115<sub>b</sub>(d)(3)], the owner or operator of an affected facility is required to submit semiannual reports to the Administrator for all periods recorded in which the pilot flame was absent. The ExxonMobil Chemical Company, Baton Rouge Resin Finishing Plant (BRFP) is submitting this semiannual report, in accordance with the requirements specified in §60.115<sub>b</sub>(d)(3).

During the period from January 1, 2018 through June 30, 2018, BRFP experienced no flare pilot flame outages that resulted in venting from a storage vessel required to be controlled by 40 CFR 60, Subpart K<sub>b</sub>.

If you have any questions please feel free to contact Mr. Marshall Berg at (225) 977-6329.

Sincerely,



Jacob Talbot  
Environmental Coordinator

cc: LA-DEQ Capital Regional Office

**ExxonMobil Chemical Company**  
Baton Rouge Resin Finishing Plant  
12480 Scenic Highway  
Baton Rouge, LA 70807-1327  
225 977 2540 Telephone  
225 977 2008 Facsimile

RECEIVED RECEIPT

2019 JAN 10 PM 4:26

**ExxonMobil**  
*Chemical*

January 10, 2019

LA-DEQ Office of Environmental Compliance  
P.O. Box 4312  
Baton Rouge, LA 70821-4312

Re: Benzene Waste Operations NESHAP (BWON) Quarterly Report  
Permit No.: 0840-00035-13  
Agency Interest No.: 3230

To Whom It May Concern:

Pursuant to 40 CFR 61.357(d)(6) and 40 CFR 61.357(d)(7) in Benzene Waste Operations NESHAP Subpart FF (BWON), Baton Rouge Resin Finishing Plant (BRFP) hereby submits to your office the inspection certification and quarterly compliance report for the period from October 1, 2018 through December 31, 2018.

BRFP certifies that all inspections on systems controlled to the standards of 40 CFR 61.343 through 40 CFR 61.349 have been performed in accordance with this subpart.

BRFP had no flare pilot outages to report under 40 CFR 61.357(d)(7).

If you have any questions please feel free to contact me at (225) 977-6329.

Sincerely,



Marshall Berg  
Environmental Air Advisor

cc: LA-DEQ, Capital Regional Office

**ExxonMobil Chemical Company**  
Baton Rouge Resin Finishing Plant  
12480 Scenic Highway  
Baton Rouge, LA 70807-1327  
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225 977 2008 Facsimile

LA-DEQ RECEIPT

2018 OCT -9 AM 11:35

**ExxonMobil**  
Chemical

October 9, 2018

LA-DEQ Office of Environmental Compliance  
P.O. Box 4312  
Baton Rouge, LA 70821-4312

Re: Benzene Waste Operations NESHAP (BWON) Quarterly Report  
Permit No.: 0840-00035-13  
Agency Interest No.: 3230

To Whom It May Concern:

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BRFP certifies that all inspections on systems controlled to the standards of 40 CFR 61.343 through 40 CFR 61.349 have been performed in accordance with this subpart.

BRFP had no flare pilot outages to report under 40 CFR 61.357(d)(7).

If you have any questions please feel free to contact me at (225) 977-6329.

Sincerely,

  
Marshall Berg  
Environmental Air Advisor

cc: LA-DEQ, Capital Regional Office

ExxonMobil Chemical Company  
Baton Rouge Resin Finishing Plant  
12480 Scenic Highway  
Baton Rouge, LA 70807-1327  
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225 977 2008 Facsimile



July 9, 2018

LA-DEQ Office of Environmental Compliance  
P.O. Box 4312  
Baton Rouge, LA 70821-4312

Re: Benzene Waste Operations NESHAP (BWON) Quarterly Report  
Permit No.: 0840-00035-12  
Agency Interest No.: 3230

To Whom It May Concern:

Pursuant to 40 CFR 61.357(d)(6) and 40 CFR 61.357(d)(7) in Benzene Waste Operations NESHAP Subpart FF (BWON), Baton Rouge Resin Finishing Plant (BRFP) hereby submits to your office the inspection certification and quarterly compliance report for the period from April 1 through June 30, 2018.

BRFP certifies that all inspections on systems controlled to the standards of 40 CFR 61.343 through 40 CFR 61.349 have been performed in accordance with this subpart.

BRFP had no flare pilot outages to report under 40 CFR 61.357(d)(7).

If you have any questions please feel free to contact Mr. Marshall Berg at (225) 977-6329.

Sincerely,

A handwritten signature in black ink, appearing to read "Jacob Talbot".

Jacob Talbot  
Environmental Coordinator

cc: LA-DEQ, Capital Regional Office